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LETTER REGARDING REGULATORY COMMENTS ON THE DISCOVERY OF FRENCH
DRAIN AND OIL WATER SEPARATOR AT SITE SOLID WASTE MANAGEMENT UNIT 64
NAS FORT WORTH TX
7/19/1996
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

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**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 302

A.F. 17A-39
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Barry R. McBea, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 19, 1996

Mr. Joseph R. Dunkle
Team Chief
Environmental Restoration Division
Air Force Center for Environmental Excellence
8001 Inner Circle Drive, Suite 2
Brooks AFB, Texas 78235-5328

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Naval Air Station Ft. Worth JRB/Carswell AFB (NAS Ft. Worth)
TNRCC Solid Waste Registration No. 65004
EPA ID NO. TX0571924042
Hazardous Waste Permit No. 50289
Interim Corrective Action at the French Drain, ST-13, SWMU No. 64

Dear Mr. Dunkle:

This letter is a formal response to the recent remedial activities conducted by the Air Force Center for Environmental Excellence (AFCEE) at the above referenced Solid Waste Management Unit (SWMU). Mr. Geoffrey Meyer of the Texas Natural Resource Conservation Commission's (TNRCC) Corrective Action Section and Mr. Tim Sewell in the TNRCC Region 4 office have been kept in close communication with your office and Parsons Engineering while the French Drain and connected Oil/Water Separator (OWS) were uncovered and partially removed. We consider these activities an interim corrective action (ICM) taken to mitigate impacts of a contaminant plume on the Unnamed Stream.

The French Drain consists of a corrugated pipe extending several hundred feet north-north west of the OWS and sub-parallel to the sanitary sewer east of the drain. The pipe is perforated along its entire length until it connects to the OWS with a two foot cast iron pipe. The OWS discharges directly into the Unnamed Stream. The pipe was uncovered at the OWS and three other location along its length identified as B-B', C-C', and D-D'. North of B-B', the French Drain is below the groundwater table. South of B-B' to the OWS, the groundwater table dips below the perforated French Drain. In addition, the French Drain appears to be notched into the underlying bedrock at approximately B-B' in order to allow the pipe to maintain its grade. The limestone bedrock acts as a aquitard for the overlying saturated alluvial deposits which include a basal gravel.

Mr. Joseph R. Dunkle

Page 2

July 19, 1996

Local shallow groundwater flows east and southeast towards the Unnamed Stream and Farmers Branch. It is apparent that the French Drain exerts significant influence on groundwater flow and contaminant migration in the upper aquifer. Known contamination in the area includes the petroleum plume extending east from the POL Tank Farm and Fuel Loading Docks to the French Drain and the free product observed in monitor well SD13-MW07 east of the OWS.

AFCEE has reportedly removed sections of the French Drain at B-B' and D-D' and backfilled the trench with clayey native soil. The pipe was reportedly damaged, but not removed, at C-C'. The OWS was either disconnected from the French Drain then cleaned and backfilled after inspection, or simply removed. TNRCC staff suggested that as much pipe as current funds allow be removed at B-B' and C-C' (up to 60 feet).

The TNRCC staff also requested that AFCEE improve the groundwater monitoring program near the Unnamed Stream area. Based on our review of AFCEE's 2nd Semi-Annual Basewide Well Monitoring Report, monitoring wells SD13-01, SD13-02, SD13-03, SD13-06, SD13-07, and OT15C are already being monitored on a quarterly basis. Monitor well SD13-07 has free product in it, while monitor well OT15C has chlorinated hydrocarbons (tetrachloroethene, methylene chloride, etc.). According to Figure 4.8 in AFCEE's November, 1995, Remedial Action Plan for ST14, BETX extends across the French Drain to monitor well SD13-02 and can be drawn to include monitor wells SD13-06 and SD13-07. In addition, Figure 5.6 in the same Remedial Action Plan shows that the ferrous iron plume (indicative of hydrocarbon biodegradation) extends to monitor well SD13-07.

In order to maintain proper surveillance of the groundwater plume impacting the Unnamed Stream area and Kings Branch, the TNRCC requests that AFCEE add monitor wells SD13-04 and ST14-MW31, and possibly ST14-MW32, to quarterly monitoring program. Monitor well ST14-MW31 should be included in case the plume changes to an easterly direction after removal of the OWS and portions of the French Drain. This is not an unlikely scenario if the Air Force's partial removal of the French Drain really did cut off flow through the French Drain. Free product and contaminated groundwater should be removed from wells nearest the Unnamed Stream (SD13-06 and SD13-07) until a permanent remedial action plan is submitted and approved.

Closure of this SWMU under the Risk Reduction Rules (30 Texas Administrative Code §335, Subchapter S) requires removal and/or decontamination of all associated SWMU components, i.e., the pipe and the OWS, and contaminated media. As a result, we request that AFCEE submit a written plan to complete the corrective action started at this SWMU with a schedule for implementation. Finally, we request that the closure plan provide a summary of recent events including field observations, maps and drawings, and the current condition of the French Drain. Please submit the plan to this office within 60 days of receipt of this letter.

Mr. Joseph R. Dunkle

Page 3

July 19, 1996

If you have any questions or need further assistance with this matter, please contact Mr. Geoffrey Meyer in the Corrective Action Section in Austin at (512) 239-2577, mail code MC127; or Mr. Tim Sewell in our Region 4 Office in Duncanville at (214) 298-6171.

Sincerely,



Paul S. Lewis, Manager
Corrective Action Section

PL/GM

cc: Mr. Joel Sanders, Southern Division, Naval Facilities Engineering Command, P.O. Box 190010, North Charleston, SC 29419-9010
Ms. Stacy Gent, Department Head, Environmental Department/Code110, Department of the Navy, Building 1215, NAS JRB Ft. Worth, Texas 76127-6200
Mr. Ohlen Long, P.E., AFBCA, 6550 White Settlement Road, Ft. Worth, Texas 76114-3520
Ms. Judith Black, USEPA Region 6

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE